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June 30, 2021

VIA ECF

Honorable Mary Kay Vyskocil, U.S.D.J.
United States District Court
Southern District of New York
500 Pearl Street, Room 18C
New York, NY 10007

USDC SDNY
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Re: *Environment Solutions Associates Group, LLC a/k/a Environmental Solutions Group Associates LLC v. Conopco, Inc. d/b/a Unilever*
Civil Action No. 1:20-cv-10699 (MKV)

Dear Judge Vyskocil:

This firm represents Plaintiff Environment Solutions Associates Group, LLC a/k/a Environmental Solutions Group Associates LLC ("Plaintiff" or "ESG") in the above-referenced matter. We write with the consent of Defendant Conopco, Inc. d/b/a Unilever ("Defendant") to request a four-week extension of the briefing schedule for Defendant's Motion to Dismiss the Second Amended Complaint.

Pursuant to the current briefing schedule (D.E. 34), Defendant's Motion is currently due on or before July 8, 2021, the Opposition is due on or before August 6, 2021, and the Reply is due on or before August 20, 2021. However, the parties' counsel have conferred regarding the current briefing schedule and have agreed, subject to Court's approval, that the Motion should be filed on or before August 5, 2021, with the Opposition due on or before September 3, 2021, and the Reply due on or before September 17, 2021.

This is the Plaintiff's first request for an adjournment or extension of time in connection with Defendant's Motion to Dismiss the Second Amended Complaint. The requested extension is not being sought for the purpose of delay, but due to scheduling conflicts of ESG's counsel.

If the proposed adjustment to the briefing schedule is acceptable to Your Honor, we respectfully request this letter be "So Ordered" and entered on the docket. As always, we thank the Court for its attention to this matter and we are available should Your Honor or Your Honor's staff have any questions or need anything further.

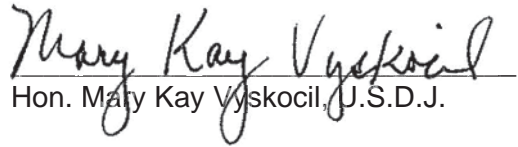
Respectfully submitted,

s/Selina M. Ellis

Selina M. Ellis

cc: Counsel of Record (via ECF)

SO ORDERED:

A handwritten signature in black ink, reading "Mary Kay Vyskocil", is written over a horizontal line.

Hon. Mary Kay Vyskocil, U.S.D.J.

Dated: June 30, 2021
New York, NY

The briefing schedule for
Defendant's motion to dismiss
is extended as set forth herein.